

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**MICHAEL DAVID SILLS and
MARY SILLS,**

Plaintiffs,

v.

**SOUTHERN BAPTIST
CONVENTION, a non-profit
corporation; DR. ED LITTON,
Individually, and as agent and/or
employee of SOUTHERN BAPTIST
CONVENTION; LIFEWAY
CHRISTIAN RESOURCES OF THE
SOUTHERN BAPTIST
CONVENTION, a non-profit
corporation; JENNIFER LYELL,
Individually and as agent and/or
employee of LIFEWAY CHRISTIAN
RESOURCES OF THE SOUTHERN
BAPTIST CONVENTION and
SOUTHERN BAPTIST
CONVENTION; ERIC GEIGER,
Individually and as agent and/or
employee of LIFEWAY CHRISTIAN
RESOURCES OF THE SOUTHERN
BAPTIST CONVENTION and
SOUTHERN BAPTIST
CONVENTION; EXECUTIVE
COMMITTEE OF THE SOUTHERN
BAPTIST CONVENTION, a non-
profit corporation; BART BARBER,
Individually and as agent and/or
employee of SOUTHERN BAPTIST
CONVENTION; WILLIE
MCLAURIN, Individually and as
agent and/or employee of
SOUTHERN BAPTIST
CONVENTION and EXECUTIVE
COMMITTEE OF THE SOUTHERN
BAPTIST CONVENTION;
ROLLAND SLADE, Individually and**

Case No. 3:23-cv-00478

JUDGE WILLIAM L. CAMPBELL, JR.

Magistrate Judge Frensley

JURY TRIAL DEMANDED

as agent and/or employee of)
 SOUTHERN BAPTIST)
 CONVENTION and EXECUTIVE)
 COMMITTEE OF THE SOUTHERN)
 BAPTIST CONVENTION; THE)
 SOUTHERN BAPTIST)
 THEOLOGICAL SEMINARY, non-)
 profit corporation; DR. R. ALBERT)
 MOHLER, Individually and as agent)
 and/or employee of THE)
 SOUTHERN BAPTIST)
 THEOLOGICAL SEMINARY and)
 SOUTHERN BAPTIST)
 CONVENTION; SOLUTIONPOINT)
 INTERNATIONAL, INC., a)
 corporation, individually and d/b/a)
 GUIDEPOST SOLUTIONS; and)
 GUIDEPOST SOLUTIONS, LLC, a)
 limited liability corporation and agent)
 of the Southern Baptist Convention,)
)
 Defendants.)

DEFENDANT LIFEWAY’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO THE COMPLAINT

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 6.01(a), Defendant LifeWay Christian Resources (“LifeWay”) hereby files this Unopposed Motion for Extension of Time to Respond to the Complaint. In support of its motion, LifeWay would respectfully show the Court as follows:

1. On May 11, 2023, Plaintiffs Michael David Sills and Mary Sills filed their Complaint against Defendants. *See* Doc. 1. LifeWay was served on May 16, 2023. Doc. 30.
2. Under Federal Rule of Civil Procedure 12(a)(1), LifeWay’s response to the Complaint is due on June 6, 2023.

3. On May 23, 2023, Defendants SolutionPoint International, Inc. and Guidepost Solutions, LLC moved for an extension of time to respond to Plaintiffs' Complaint up to and including July 12, 2023. Doc. 15. The Court granted their motion. Doc. 18.

4. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 6.01(a), Defendant LifeWay respectfully requests that the Court also extend its time to respond to the Complaint up to and including July 12, 2023. LifeWay's counsel has contacted counsel for Plaintiffs, and Plaintiffs do not oppose this Motion. No other party is impacted by the relief requested herein. Plaintiffs agree that by seeking an extension of time, LifeWay is not waiving any defense.

5. There is good cause for this extension. The Complaint raises allegations that date back as early as spring 2018 and concern numerous defendants. *See* Compl. ¶¶ 16–28, 33, 35, 38. LifeWay's counsel needs additional time to prepare LifeWay's response to the Complaint and consider defenses specific to LifeWay. Further, a single answer deadline will allow this action to proceed smoothly, as LifeWay would likely be waiting on other defendants' appearances to complete Rule 26 requirements.

WHEREFORE, LifeWay respectfully asks the Court to extend LifeWay's deadline to respond to the Complaint up to and including July 12, 2023.

Dated: May 31, 2023

Respectfully submitted,

/s/ George H. Cate, III

George H. Cate, III (BPR #12595)

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was served on the following via the Court's CM/ECF system on May 31, 2023:

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/s/ George H. Cate, III
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